

BOIES SCHILLER FLEXNER LLP

Mark C. Mao (CA Bar No. 236165)
mmao@bsflfp.com
Beko Reblitz-Richardson (CA Bar No. 238027)
brichardson@bsflfp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

SUSMAN GODFREY L.L.P.

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

MORGAN & MORGAN

John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel
listed in signature blocks below*

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel
listed in signature blocks below*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
TRUJILLO, WILLIAM BYATT, JEREMY
DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
GOOGLE TO SUBMIT DECLARATION
IN SUPPORT OF PLAINTIFFS' MOTION
TO SEAL (DKT. 429)**

Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on February 26, 2022, Plaintiffs filed their Administrative Motion To Consider Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s Discovery Misconduct (“Motion to Seal”) (Dkt. 429);

WHEREAS, on February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with Dkts. 429, 430;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the Designating Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material is sealable, is by Saturday, March 5, 2022;

WHEREAS, the Parties agree that an extension of time of 11 days will provide Google with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 429);

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 429), to March 16, 2022.

DATED: March 1, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

BOIES SCHILLER FLEXNER LLP

/s/ Andrew H. Schapiro

/s/ Mark Mao

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No.
238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

Stephen A. Broome (CA Bar No. 314605)
sb@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

James W. Lee (*pro hac vice*)
jlee@bsflp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsflp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130
Tel: (305) 539-8400
Fax: (305) 539-1304

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I Street NW, Suite 900
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
Washington D.C., 20005
Tel: (202) 538-8000
Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: (415) 875-6600
Fax: (415) 875-6700

Attorneys for Defendant Google LLC

William Christopher Carmody (*pro hac vice*)

bcarmody@susmangodfrey.com

Shawn J. Rabin (*pro hac vice*)

srabin@susmangodfrey.com

Steven Shepard (*pro hac vice*)

sshepard@susmangodfrey.com

Alexander P. Frawley (*pro hac vice*)

afrawley@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1301 Avenue of the Americas, 32nd Floor

New York, NY 10019

Tel: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)

abonn@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)

jyanchunis@forthepeople.com

Ryan J. McGee (*pro hac vice*)

rmcgee@forthepeople.com

MORGAN & MORGAN, P.A.

201 N Franklin Street, 7th Floor

Tampa, FL 33602

Tel: (813) 223-5505

Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)

mram@forthepeople.com

MORGAN & MORGAN, P.A.

711 Van Ness Avenue, Suite 500

San Francisco, CA 94102

Tel: (415) 358-6913

Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 429). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: March 1, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

~~[PROPOSED]~~ ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 429), shall be extended to March 16, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 2, 2022



HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge